

**Comments on the public notice released on June 2, 2009, (DA 09-1233),
draft eligible services list (ESL) for the schools and libraries universal
service support mechanism for the funding year 2010**

CC Docket No. 02-6

Comments on “Internet Access – Web Hosting”

We welcome the inclusion of “intranet service and/or password protected pages” into the eligible services. This will significantly increase the usability of websites for schools, e.g. it will enable schools to use the web for communication with students and with the parent community and thus reduce paper usage and related cost and labor.

Most services listed in the document such as telecommunication services are industry standard based and therefore the same service is offered by many vendors. Schools can easily switch from one vendor to another in a new funding period with minimum overhead. However, as the definition of web hosting is expanded to include ‘intranet service and/or password protected pages’, it is unclear as to what is eligible. There are no industry standards to comply in this area.

In order for vendors to provide Intranet and password protected pages, they need to be an Application Service Provider (ASP), so that the vendor solution can manage user names & passwords, user authentication and support the logic for creating and displaying appropriate pages based on privileges. This appears contradictory to the statement:

“Funding is strictly limited to the following eligible web hosting functions:

- o Provision of web site traffic (bandwidth)
- o Provision of disk space for storing applicant provided content
- o Provision of File Transfer Protocol (FTP) transfer or a Web interface to upload files”

which suggests pure web hosting where school creates web pages and either FTP or upload them to the web server.

Are Application Service Providers for school web sites now eligible for E-rate program? We recommend that they be made eligible as ASPs can significantly enhance the use of school web sites.

“Intranet web hosting” is defined in the document glossary as “intranet web hosting provides private web pages to authorized users using a log in name and password” It is unclear on what is eligible and not eligible for E-Rate program.

- Many schools have told us that they would like to securely publish grades, assignments and dues. If a vendor provides a solution for creating the privileged content (password protected content that needs to be shown based on user verification) required by schools online, is that solution eligible?
- If schools push privileged data for website publishing from, say, a desktop software application (which is not eligible) to their website, the hosting vendor, an ASP, needs to implement a protocol to receive and publish the pushed content. Is that protocol implementation by the ASP covered under the eligible services? Such protocols can be vendor dependent, often private, supported only across vendor products and/or just partner products. If data exchange with the hosting vendor is eligible, we would like to encourage the FCC to mandate it based on open standards and in cases where such open standards don't exist, require vendors to publish such protocols for other vendors who wish to implement them.

SchoolSpeak recommends that the draft 2010 Eligible Services List be revised to address the issues described above. Such revisions provide additional clarity and are therefore in the public interest.

Respectfully submitted

Shiju John,
President, SchoolSpeak Inc.